

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING TIME TO FILE  
CONSOLIDATED AMENDED COMPLAINT AND MOTION TO DISMISS**

WHEREAS, this action is governed by the lead plaintiff and lead plaintiff's counsel selection procedures of the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3);

WHEREAS, on September 7, 2021 Junhong Cao ("Cao") moved this Court for appointment as Lead Plaintiff and for approval of her selection of lead counsel;

WHEREAS, on October 12, 2021, this Court appointed Cao as Lead Plaintiff and The Rosen Law Firm, P.A. as Lead Counsel for the Class in the above-captioned action;

WHEREAS, Lead Plaintiff contends that additional time is needed to work out service of process for certain defendants who are located in the People's Republic of China;

WHEREAS, Lead Plaintiff and Defendant DiDi Global, Inc. ("Defendant") have conferred and have agreed to a schedule, subject to Court approval, for Lead Plaintiff to file a consolidated amended complaint and for Defendant to answer or otherwise respond to such complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Lead Plaintiff shall file an amended consolidated complaint (the "Amended Complaint") on or before January 7, 2022.

2. Defendant shall answer or otherwise respond to Lead Plaintiff's Amended Complaint by March 8, 2022.
3. If Defendant moves to dismiss the Amended Complaint, Lead Plaintiff shall file any opposition to such motion on or before May 9, 2022, and Defendant shall file any reply in support of such motion on or before June 23, 2022.

Respectfully submitted,

Dated: October 21, 2021

/s/ Corey Worcester

Corey Worcester  
Renita Sharma  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Floor  
New York, New York 10038  
Tel: (212) 849-7000  
Fax: (212) 849-7100  
coreyworcester@quinnemanuel.com  
renitasharma@quinnemanuel.com

/s/ Laurence Rosen

Phillip Kim  
Laurence Rosen  
The Rosen Law Firm, P.A.  
275 Madison Avenue, 40th Floor  
New York, New York 10016  
Tel: (212) 686-1060  
Fax: (212) 202-3827  
pkim@rosenlegal.com  
lrosen@rosenlegal.com

Robert Fumerton  
Michael Griffin  
Scott Musoff  
Skadden, Arps, Slate, Meagher & Flom LLP  
One Manhattan West  
New York, New York 10001  
Tel: (212) 735-3902  
Fax: (212) 777-3902  
robert.fumerton@skadden.com  
michael.griffin@skadden.com  
smusoff@skadden.com

*Lead Counsel for Lead Plaintiff and the Class*

*Counsel for Defendant DiDi Global Inc.*

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Hon. Lewis A. Kaplan, U.S. District Judge

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this 21st day of October, 2021, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Corey Worcester